

Mr. David Woolley
The Pillsbury Company
707 Pillsbury Lane
New Albany, Indiana 47150

Re: 043-13907
Notice-only change to
MSOP 043-10995-00050

Dear Mr. Woolley:

The Pillsbury Company was issued a permit on November 9, 1999, for a stationary refrigerated baked goods production process. A letter sent to the Office of Air Quality requesting a clarification regarding conditions of the permit was received on February 12, 2001. Pursuant to the provisions of 326 IAC 2-6.1-6 the permit is hereby revised as follows:

1. Condition D.2.6, requiring parametric monitoring of the dust collectors used in conjunction with the pneumatic conveyance steps and the vacuum system, requires the instrument used for determining pressure to comply with Section C - Pressure Gauge Specifications. These specifications were erroneously left out of section C of the permit. Therefore, a new condition containing the specifications, condition C.14, is now added to section C of the permit. Conditions C.14 through C.20 are re-numbered as C.15 through C.21. The new condition C.14 now reads as follows:

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]

- (a) **Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.**
 - (b) **The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.**
2. Condition C.20, General Reporting Requirements, required the source to submit a Semi-annual Compliance Monitoring Report, but no report form was included with the permit. This condition is now revised to remove all references to this report. Instead, a new condition, condition C.22, has been added to section C which requires the submittal of an Annual Notification stating whether or not the source is in operation and in compliance with the terms and conditions contained in the permit. An Annual Notification form has also been added to the permit. At this time, the only report required by this permit is the Annual Notification. The revised condition C.20, now C.21, and the new condition C.22 now read as follows:

C.201 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

~~(a)~~ To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

~~(b)~~ The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~(c)~~ Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAMQ, on or before the date it is due.

~~(d)~~**(b)** Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

~~(e)~~**(c)** All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) A malfunction as described in 326 IAC 1-6-2; or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

~~(f)~~**(d)** Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

~~(g)~~**(e)** The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.22 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) **Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.**
- (b) **Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.**
- (c) **The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:**

**Compliance Data Section, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015**
- (d) **The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.**

3. It should also be noted that as of January 1, 2001, the Office of Air Management is now being referred to as the Office of Air Quality. Therefore, all references to the Office of Air Management have been revised to refer to the Office of Air Quality.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Trish Earls, at (973) 575-2555, ext. 3219, or dial (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
TE/EVP

cc: File - Floyd County
U.S. EPA, Region V
Floyd County Health Department
Air Compliance Section Inspector Joe Foyst
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

NEW SOURCE CONSTRUCTION PERMIT and MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**The Pillsbury Company
707 Pillsbury Lane
New Albany, Indiana 47150**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

| | |
|--|---------------------------------|
| Operation Permit No.: MSOP 043-10995-00050 | |
| Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality | Issuance Date: November 9, 1999 |

| | |
|--|---|
| First Notice-only Change 043-13907-00050 | Pages Affected: 2, 3, 13, 14, 17, 18, 30a |
| Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality | Issuance Date: |

TABLE OF CONTENTS

| | | |
|------------|--|-----------|
| A | SOURCE SUMMARY | 4 |
| A.1 | General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)] | |
| A.2 | Emission Units and Pollution Control Equipment Summary | |
| A.3 | Part 70 Permit Applicability [326 IAC 2-7-2] | |
| B | GENERAL CONSTRUCTION CONDITIONS | 7 |
| B.1 | Permit No Defense [IC 13] | |
| B.2 | Definitions | |
| B.3 | Effective Date of the Permit [IC 13-15-5-3] | |
| B.4 | Revocation of Permits [326 IAC 2-1.1-9(5)] | |
| B.5 | Modification to Permit [326 IAC 2] | |
| B.6 | Minor Source Operating Permit [326 IAC 2-6.1] | |
| C | SOURCE OPERATION CONDITIONS | 9 |
| C.1 | PSD Minor Source Status [326 IAC 2-2] | |
| C.2 | Emission Offset Minor Source Status [326 IAC 2-3] | |
| C.3 | Preventive Maintenance Plan [326 IAC 1-6-3] | |
| C.4 | Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6] | |
| C.5 | Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] | |
| C.6 | Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)] | |
| C.7 | Permit Revocation [326 IAC 2-1-9] | |
| C.8 | Opacity [326 IAC 5-1] | |
| C.9 | Fugitive Dust Emissions [326 IAC 6-4] | |
| C.10 | Performance Testing [326 IAC 3-6] | |
| C.11 | Compliance Monitoring [326 IAC 2-1.1-11] | |
| C.12 | Maintenance of Monitoring Equipment [IC 13-14-1-13] | |
| C.13 | Monitoring Methods [326 IAC 3] | |
| C.14 | Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] | |
| C.15 | Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6] | |
| C.16 | Actions Related to Noncompliance Demonstrated by a Stack Test | |
| | Record Keeping and Reporting Requirements | |
| C.17 | Malfunctions Report [326 IAC 1-6-2] | |
| C.18 | Annual Emission Statement [326 IAC 2-6] | |
| C.19 | Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-3] | |
| C.20 | General Record Keeping Requirements [326 IAC 2-6.1-2] | |
| C.21 | General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13] | |
| C.22 | Annual Notification [326 IAC 2-6.1-5(a)(5)] | |
| D.1 | Emissions unit OPERATION CONDITIONS - Heaters and Boilers | 19 |
| | Emission Limitations and Standards | |
| D.1.1 | Particulate Matter Limitation (PM) [326 IAC 6-2-3] | |
| | Compliance Determination Requirements | |
| D.1.2 | Testing Requirements | |
| D.2 | Emissions unit OPERATION CONDITIONS - Pneumatically Conveyed Operations | 20 |
| | Emission Limitations and Standards | |
| D.2.1 | Particulate Matter (PM) [326 IAC 6-3] | |
| D.2.2 | Preventive Maintenance Plan [326 IAC 1-6-3] | |
| | Compliance Determination Requirements | |

- D.2.3 Testing Requirements
- D.2.4 Particulate Matter (PM)

Compliance Monitoring Requirements

- D.2.5 Visible Emissions Notations
- D.2.6 Parametric Monitoring
- D.2.7 Baghouse Inspections
- D.2.8 Broken Bag or Failure Detection

Record Keeping and Reporting Requirements

- D.2.9 Record Keeping Requirements

D.3 Emissions unit OPERATION CONDITIONS - Cold Cleaner Degreaser 27

Emission Limitations and Standards

- D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5(a)]

Compliance Determination Requirements

- D.3.2 Testing Requirements

D.4 Emissions unit OPERATION CONDITIONS - Storage Tanks 29

Emission Limitations and Standards

- D.4.1 Volatile Organic Compounds (VOCs) [326 IAC 12] [40 CFR 60.110b, Subpart Kb]
- D.4.2 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

- D.4.3 Testing Requirements

Record Keeping and Reporting Requirements

- D.4.4 Record Keeping Requirements

Annual Notification 30a

Malfunction Report 30

C.12 Maintenance of Monitoring Equipment [IC 13-14-1-13]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (b) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) A malfunction as described in 326 IAC 1-6-2; or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (d) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.22 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

| | |
|----------------------|----------------------------------|
| Company Name: | The Pillsbury Company |
| Address: | 707 Pillsbury Lane |
| City: | New Albany, Indiana 47150 |
| Phone #: | 812-944-8411 |
| MSOP #: | 043-10995-00050 |

I hereby certify that The Pillsbury Company is ☒ still in operation.
☐ no longer in operation.

I hereby certify that The Pillsbury Company is ☒ in compliance with the requirements of MSOP **043-10995-00050**.
☐ not in compliance with the requirements of MSOP **043-10995-00050**.

| |
|---------------------------------------|
| Authorized Individual (typed): |
| Title: |
| Signature: |
| Date: |

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

| |
|-----------------------|
| Noncompliance: |
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